

The Honorable Barbara J. Rothstein

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

PAMELA SWETZOF

Plaintiff,

v.

UNITED STATES OF AMERICA,

Defendant.

Case No. 3:21-cv-05705-BJR

STIPULATION AND ORDER EXTENDING
DISCOVERY CUT-OFF

JOINT STIPULATION

The parties hereby jointly STIPULATE AND AGREE to extend the following pretrial deadlines as set forth in the Court's January 23, 2022, Minute Order Setting Trial Dates and Related Dates (Dkt. 19) as follows:

<u>Deadline</u>	<u>Current Deadline</u>	<u>Proposed New Deadline</u>
Deadline for report of Plaintiff's expert, Dr. Adler	July 19, 2022	July 22, 2022
Discovery completed by	August 3, 2022	September 2, 2022

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Good cause exists for extending these deadlines. Although the parties have conducted extensive fact discovery to date, the parties also await additional medical records pertaining to Plaintiff that may impact the opinions to be proffered by the respective expert witnesses. This extension allows time for receipt/analysis of these records and facilitates complete reporting by these witnesses. As well, the United States anticipates rebuttal expert witnesses may be necessary, but cannot make that determination until Plaintiff discloses their expert report(s). Plaintiff recently secured an extension of time to disclose the report of her expert witness, Dr. Richard Adler. Dkt. 24. However, Plaintiff anticipates the report will not be ready until July 22, 2022, and the United States is amenable to this small, additional extension of time. Furthermore, extension of the discovery cut-off by one month allows time for the United States to retain and disclose a rebuttal expert and also allows for Plaintiff to complete his/her deposition. This extension will not impact the remaining deadlines set forth in the Court's initial scheduling order. For the reasons set forth above, the parties believe that there is good cause to request an extension of the above-listed pretrial deadlines and respectfully request that the Court grant their motion.

SO STIPULATED.

DATED this 14th day of July, 2022.

NICHOLAS W. BROWN
United States Attorney

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s/ Greg S. Memovich

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Attorney for Plaintiff

ORDER

The parties having so stipulated and agreed, it is hereby **ORDERED** Plaintiff has until July 22, 2022 to disclose the report of expert witness Richard Adler and the discovery cut-off is extended to September 2, 2022.

DATED this 18th day of July, 2022.



BARBARA J. ROTHSTEIN
United States District Judge